

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Kris Bortnovsky, aka "Kris Bort,"  
and Ryan Shapiro

Case No.

21-MJ-2826-MBB

---

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2017 - November 2021 in the county of Suffolk in the  
       District of Massachusetts, the defendant(s) violated:*Code Section*

18 U.S.C. § 371

*Offense Description*

Conspiracy to commit securities fraud

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent BJ Kang

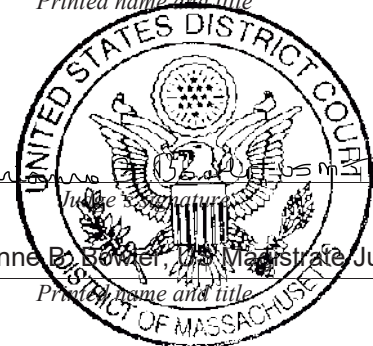
☒ Continued on the attached sheet.

Complainant's signature

Special Agent BJ Kang

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/06/2021City and state: Brookline, MA

Hon. Marianne B. Bowler, U.S. Magistrate Judge

Printed name and title